

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

KEVIN SCOTT

Plaintiff

v.

Case No. 16-13734

Honorable Denise Page Hood

Magistrate David R. Grand

TROTT LAW, P.C.,

Defendant(s)

FILED

2017 APR 17 P 12:20

U.S. DISTRICT COURT OF EASTERN DISTRICT OF MICHIGAN  
CLERK OF COURT  
TROY, MI 48063-1500

**PLAINTIFF REPLY TO TROTT LAW'S RESPONSE TO PLAINTIFF'S MOTION TO  
COMPEL TROTT TO SUBMIT DOCUMENTS ON GROUND SEEKING PROTECTION  
ORDER OR PRIVILEGE OR OTHER PROTECTION**

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Now Comes Plaintiff Reply, Trott didn't cite a privilege log or submit the same to the Court. Trott believes all they have to do is to only say communications and that's it. Trott must submit to the Court the communication, so the Court can

make its ruling of privileged. Fed .R. Civ. P. 26 (a)(5)(ii) states **describe the nature of the documents, communications, or tangible things not produce or disclosed.**

### **TRIAL PREPARATION: MATERIALS**

Say in part: (A) Documents and Tangible Things. Ordinarily, a party may not discover documents and tangible things that are prepared in anticipation of litigation or for trial by or for another party or its representative including the other party's attorney, consultant, surety, indemnitor, insurer, or agent. But , subject to Rule 26(b)(4) those material may be discovered if:

(i) they are otherwise discoverable under Rule 26 (b)(1); and

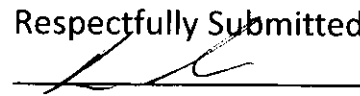
(ii) the party shows that it has substantial need for the materials to prepare its case and cannot without undue hardship, obtain their substantial equivalent by other means.

In this case the three other entities has refused to talk or acknowledge anything with Plaintiff, and since Trott is not the other entities Lawyer anything they obtain are discovery to Plaintiff so that Plaintiff can prepare its case.

Nothing submitted by Trott would Allow the Court to make a fair assessment. Plaintiff is not trying to eviscerate the rule, but the Court must have more information, accordingly Plaintiff motion to compel more information to the Court should be Ordered.

Date: April 17, 2017

Respectfully Submitted

  
KScott@mi.rr.com

(248) 789-6869

#### **CERTIFICATE OF SERVICE**

I herby certify that a copy of this complaint was served to the Attorney Richard Welke Trott Law, P.C. at 31440 Northwestern Hwy., Suite 200 Farmington Hills, Michigan 48334. I also certify a copy was filed with the District Court.

Date: April 17, 2017

Respectfully Submitted

  
KScott@mi.rr.com

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